

Exhibit B

EXHIBIT B

No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
'669 Patent				
1.	14	"A method of adjusting Forward Error Correcting (FEC) coding in a Digital Subscriber Line (DSL) modem in which data is transmitted between a transmitter and a receiver on a channel"	No construction necessary; the preamble is not limiting.	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> '669 Patent at Fig. 6, 21:61–23:10, Abstract, 1:26–31, 1:46–2:28, 3:61–66, 4:6–5:2, 5:14–35, 5:39–62, 6:51–59, 10:23–29, 12:10–39, 13:4–7, 14:6–19, 14:20–17:62, 20:41–52. ASSIA_AT&T-014691–ASSIA_AT&T-014717. Prosecution history of all claims of the '669 Patent. <i>See, e.g.</i>, ASSIA_AT&T-005122–ASSIA_AT&T-005819. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-

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				<p>001294-001789; ASSIA_AT&T-001812- 001969; ASSIA_AT&T- 001999-002730; ASSIA_AT&T-002779- 002934; ASSIA_AT&T- 003256-003833; ASSIA_AT&T-004446- 004505; ASSIA_AT&T- 004531-004750; ASSIA_AT&T-010865- 011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069864- 069866; ASSIA_AT&T- 069860-069863; ASSIA_AT&T-069855, ASSIA_AT&T-069858- 069859; ASSIA_AT&T- 069867; ASSIA_AT&T- 069882; ASSIA_AT&T- 069886; ASSIA_AT&T- 069890-069891; ASSIA_AT&T-069875; ASSIA_AT&T-069915; ASSIA_AT&T-069918- 069919; ASSIA_AT&T- 069931-069935; ASSIA_AT&T-069937;

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				<p>ASSIA_AT&T-069939; ASSIA_AT&T-069894; ASSIA_AT&T-069897– 069898; ASSIA_AT&T- 069901–069904; ASSIA_AT&T-069907– 069909; ASSIA_AT&T- 069911; ASSIA_AT&T- 069963; ASSIA_AT&T- 069966–069967; ASSIA_AT&T-069940– 069942; ASSIA_AT&T- 069947; ASSIA_AT&T- 069951; ASSIA_AT&T- 069956–069957; <i>see also</i> ASSIA_AT&T-069850– ASSIA_AT&T-069974.</p> <ul style="list-style-type: none"> • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '669 Patent.
2.	14	“adjusting the CCR when the MEV differs sufficiently from the TEV”	No construction necessary; not indefinite.	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '669 Patent at 21:61–23:10, Fig. 4, Fig. 5 , 1:33–61, 2:57–3:4, 3:5–3:28, 3:61–66, 3:66–4:2, 4:6–37, 4:38–51, 5:47–62, 5:63–6:10, 7:31–55, 8:15–35, 8:61–9:7, 9:8–67, 10:1–

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				<p>22, 12:10–39, 12:40–13:3, 13:50–14:5, 15:48–64, 16:63–17:46.</p> <ul style="list-style-type: none"> • ASSIA_AT&T-014691–ASSIA_AT&T-014717. • Prosecution history of all claims of the '669 Patent. <i>See, e.g.</i>, ASSIA_AT&T-005122–ASSIA_AT&T-005819. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-

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				<p>003256–003833; ASSIA_AT&T-004446– 004505; ASSIA_AT&T- 004531–004750; ASSIA_AT&T-010865– 011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069947–069951; ASSIA_AT&T-069867–069869; ASSIA_AT&T-069931; ASSIA_AT&T-069894–069896; ASSIA_AT&T-069963–069965; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '669 Patent.
'458 Patent				
3.	1	“A method of evaluating operational characteristics of a multi-line, vectored Digital Subscriber Line (DSL) system having a plurality of crosstalking	No construction necessary; the preamble is non-limiting.	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '458 Patent 18:33–20:10, Abstract, Fig. 3, Fig. 5A, 1:26–38, 2:48–67, 3:36–53, 3:65–4:51, 5:31–35, 8:13–27,

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		lines in a common communication channel (channel)"		<p>11:17–53, 13:15–37, 13:38–14:53, 18:20–31.</p> <ul style="list-style-type: none"> • ASSIA_AT&T-014788–ASSIA_AT&T-014813. • Prosecution history of all claims of the '458 Patent. <i>See, e.g.</i>, ASSIA_AT&T-009741–ASSIA_AT&T-010290. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Expert declaration. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–

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				<p>011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069858; ASSIA_AT&T-069871; ASSIA_AT&T-069880; ASSIA_AT&T-069883; ASSIA_AT&T-069888; ASSIA_AT&T-069917; ASSIA_AT&T-069900; ASSIA_AT&T-069910; ASSIA_AT&T-069912; ASSIA_AT&T-069969; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '458 Patent.
4.	4	“on a periodic basis”	At fixed intervals	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '458 Patent at 18:33–20:10, 13:55–14:8. • ASSIA_AT&T-014788–ASSIA_AT&T-014813. • Prosecution history of all claims of the '458 Patent. <i>See, e.g.</i>, ASSIA AT&T-

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				<p>009741–ASSIA_AT&T-010290.</p> <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050. • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069884;

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				<p>ASSIA_AT&T-069913; ASSIA_AT&T-069928; ASSIA_AT&T-069972; <i>see also</i> ASSIA_AT&T-069850– ASSIA_AT&T-069974.</p> <ul style="list-style-type: none"> • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '458 Patent.
'122 Patent				
5.	14–18, 20	“DSL line set”	Set of one or more DSL lines	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '122 Patent at 18:7–22:8, 18:39–45, 20:34–38, 1:34–61, 11:38–60, 13:65–14:22, 14:59–15:15, 15:16–45. • ASSIA_AT&T-014740–ASSIA_AT&T-014762. • Prosecution history of all claims of the '122 Patent. <i>See, e.g.</i>, ASSIA_AT&T-008802–ASSIA_AT&T-009740. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed

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				<p>expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos.</p> <ul style="list-style-type: none"> • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050. • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069858; ASSIA_AT&T-069887; ASSIA_AT&T-069888; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions

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				<ul style="list-style-type: none"> The patents and/or publications cited on the face of the '122 Patent.
6.	14, 20	<p>“a data collection unit configured to collect operational data from a new DSL line set and an already-operating DSL line set”</p> <p>“collecting operational data, via a data collection unit, from the new DSL line set and the already-operating DSL line set”</p>	<p>No construction necessary; these terms are not governed by § 112(f).</p> <p>In the alternative: if § 112(f) does apply, the function for claim 14 is:</p> <p>collecting operational data from a new DSL line set and an already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC, computer module, etc. as described at 13:35–39.</p> <p>If § 112(f) does apply, the function for claim 20 is:</p> <p>collecting operational data from a new DSL line set and an already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC,</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> '122 Patent at 18:7–22:8, Abstract, Fig. 1, Fig. 3A, Fig. 3B, Fig. 6, 1:34–61, 1:65–2:8, 2:52–3:27, 3:34–54, 4:8–39, 4:51–6:67, 9:9–21, 12:60–13:34, 13:35–13:64, 14:40–58, 16:4–17:13, 17:14–59. ASSIA_AT&T-014740–ASSIA_AT&T-014762. Prosecution history of all claims of the '122 Patent. <i>See, e.g.</i>, ASSIA_AT&T-008802–ASSIA_AT&T-009740. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-

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			computer module, etc. as described at 13:35–39.	<p>000275–001132; ASSIA_AT&T-00114– 001290; ASSIA_AT&T- 001294–001789; ASSIA_AT&T-001812– 001969; ASSIA_AT&T- 001999–002730; ASSIA_AT&T-002779– 002934; ASSIA_AT&T- 003256–003833; ASSIA_AT&T-004446– 004505; ASSIA_AT&T- 004531–004750; ASSIA_AT&T-010865– 011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069853; ASSIA_AT&T-069858; ASSIA_AT&T-069873; ASSIA_AT&T-069877; ASSIA_AT&T-069878; ASSIA_AT&T-069883; ASSIA_AT&T-069892; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions • The patents and/or publications cited on the face

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				of the '122 Patent.
7.	14, 20	<p>“an analysis unit coupled to the collection unit, wherein the analysis unit is configured to: analyze the collected operational data; determine an operational configuration for at least one DSL line in the new DSL line set that will allow the new DSL line set to join the already-operating DSL line set without disrupting the already-operating DSL line set; evaluate data received by the new DSL line set; and evaluate data received by the already-operating DSL line set;”</p> <p>“performing the following operations, via an analysis unit coupled to the collection unit: analyzing the collected operational data; determining an operational configuration for at least one DSL line in the new DSL line set that will allow the new DSL line set to join the already-operating DSL line set without disrupting the already-operating DSL line set; evaluating data received by the new DSL line</p>	<p>No construction necessary; these terms are not governed by § 112(f).</p> <p>In the alternative, if § 112(f) does apply, the function for claim 14 is:</p> <p>analyzing the collected operational data; determine an operational configuration for at least one DSL line in the new DSL line set that will allow the new DSL line set to join the already-operating DSL line set without disrupting the already-operating DSL line set; evaluate data received by the new DSL line set; and evaluate data received by the already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC, computer module, etc. as described at 13:35–39.</p> <p>If § 112(f) does apply, the function for claim 20 is:</p> <p>analyzing the collected operational</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '122 Patent at 18:7–22:8, Abstract, Fig. 1, Fig. 3A, Fig. 3B, Fig. 6, 1:34–61, 1:65–2:8, 2:52–3:27, 3:34–54, 4:8–39, 4:51–6:67, 9:9–21, 12:60–13:34, 13:35–13:64, 13:65–14:22, 14:40–58, 16:4–17:13, 17:14–59. • ASSIA_AT&T-014740–ASSIA_AT&T-014762. • Prosecution history of all claims of the '122 Patent. <i>See, e.g.</i>, ASSIA_AT&T-008802–ASSIA_AT&T-009740. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132;

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		set; and evaluating data received by the already-operating DSL line set;"	<p>data; determine an operational configuration for at least one DSL line in the new DSL line set that will allow the new DSL line set to join the already-operating DSL line set without disrupting the already-operating DSL line set; evaluate data received by the new DSL line set; and evaluate data received by the already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC, computer module, etc. as described at 13:35–39.</p>	<p>ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069853; ASSIA_AT&T-069854; ASSIA_AT&T-069858; ASSIA_AT&T-069859; ASSIA_AT&T-069872; ASSIA_AT&T-069873; ASSIA_AT&T-069874; ASSIA_AT&T-069877; ASSIA_AT&T-069878; ASSIA_AT&T-069880; ASSIA_AT&T-069883; ASSIA_AT&T-069886; ASSIA_AT&T-069892; ASSIA_AT&T-069899;

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				<p>ASSIA_AT&T-069912; ASSIA_AT&T-069928; ASSIA_AT&T-069968; ASSIA_AT&T-069970.; <i>see also</i> ASSIA_AT&T-069850– ASSIA_AT&T-069974.</p> <ul style="list-style-type: none"> • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '122 Patent.
8.	14, 20	<p>“a control signal generator coupled to the analysis unit, wherein the control signal generator is configured to send control signals to the new DSL line set and to the already-operating DSL line set, further wherein the control signals comprise signals controlling operation of at least one of the following: the new DSL line set; or the already-operating DSL line set;”</p> <p>“sending control signals, via a control signal generator coupled to the analysis unit, to the new DSL line set and to the already-operating DSL line set, further</p>	<p>No construction necessary; these terms are not governed by § 112(f).</p> <p>In the alternative, if § 112(f) does apply, the function for claim 14 is:</p> <p>sending control signals to the new DSL line set and to the already-operating DSL line set, further wherein the control signals comprise signals controlling operation of at least one of the following: the new DSL line set; or the already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC,</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '122 Patent at 18:7–22:8, Abstract, Fig. 1, Fig. 3A, Fig. 3B, Fig. 6, 1:34–61, 1:65–2:8, 2:52–3:27, 3:34–54, 4:8–39, 4:51–6:67, 9:9–21, 12:60–13:34, 13:35–13:64, 14:40–58, 16:4–17:13, 17:14–59. • ASSIA_AT&T-014740–ASSIA_AT&T-014762. • Prosecution history of all claims of the '122 Patent. <i>See, e.g.</i>, ASSIA_AT&T-008802–ASSIA_AT&T-009740. <p>Extrinsic Evidence:</p>

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		wherein the control signals comprise signals controlling operation of at least one of the following: the _new DSL line set; or the already-operating DSL line set;”	<p>computer module, etc. as described at 13:65–14:18.</p> <p>In the alternative, if § 112(f) does apply, the function for claim 20 is:</p> <p>sending control signals to the new DSL line set and to the already-operating DSL line set, further wherein the control signals comprise signals controlling operation of at least one of the following: the new DSL line set; or the already-operating DSL line set</p> <p>The corresponding structure includes: a computer, processor, IC, computer module, etc. as described at 13:65–14:18.</p>	<ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050. • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069858; ASSIA_AT&T-069872; ASSIA_AT&T-069873; ASSIA_AT&T-069874; ASSIA_AT&T-069883;

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				<p>ASSIA_AT&T-069892; ASSIA_AT&T-069899; ASSIA_AT&T-069968; <i>see also</i> ASSIA_AT&T-069850– ASSIA_AT&T-069974.</p> <ul style="list-style-type: none"> • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '122 Patent.
9.	20	“machine readable medium”	<p>No construction necessary.</p> <p>In the alternative, tangible medium of a computer program product.</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '122 Patent at 18:7–22:8, Fig. 6, 16:4–63, 16:64–17:59, 17:60–18:4. • ASSIA_AT&T-014740–ASSIA_AT&T-014762. • Prosecution history of all claims of the '122 Patent. <i>See, e.g.</i>, ASSIA_AT&T-008802–ASSIA_AT&T-009740. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>,

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'631 Patent				
10.	1, 34	"substantially not simultaneous"	No construction necessary.	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> '631 Patent at 4:42–59, 9:57–63, 14:2–10, 14:18–23, 14:40–46. ASSIA_AT&T-014718–ASSIA_AT&T-014739. Prosecution history of all claims of the '631 Patent. <i>See, e.g.</i>, ASSIA_AT&T-070340-ASSIA_AT&T-070850. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-

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				<p>001999–002730; ASSIA_AT&T-002779– 002934; ASSIA_AT&T- 003256–003833; ASSIA_AT&T-004446– 004505; ASSIA_AT&T- 004531–004750; ASSIA_AT&T-010865– 011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-09867; ASSIA_AT&T-069888–069889; ASSIA_AT&T-069921–069924; ASSIA_AT&T-069925; ASSIA_AT&T-069930; ASSIA_AT&T-069963; ASSIA_AT&T-069974.; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '631 Patent.
11.	1, 9, 11, 14, 33, 34, 35, 37	“physical channel”	No construction necessary.	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '631 Patent at 1:24–34, 2:1–

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<p>12, 2:30–44, Fig. 3, Fig. 4, Fig. 5, Fig. 6, Fig. 7.</p> <ul style="list-style-type: none"> • ASSIA_AT&T-014718–ASSIA_AT&T-014739. • Prosecution history of all claims of the '631 Patent. <i>See, e.g.</i>, ASSIA_AT&T-070473; ASSIA_AT&T-070507; <i>see also</i> ASSIA_AT&T-070340–ASSIA_AT&T-070850. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<p>002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050.</p> <ul style="list-style-type: none"> • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069921–069924; ASSIA_AT&T-069867; ASSIA_AT&T-069875; ASSIA_AT&T-069915; ASSIA_AT&T-069920; ASSIA_AT&T-069931–069933; ASSIA_AT&T-069938; ASSIA_AT&T-069894; ASSIA_AT&T-069897; ASSIA_AT&T-069907–069909; ASSIA_AT&T-069914; ASSIA_AT&T-069963; ASSIA_AT&T-069966; ASSIA_AT&T-069973; ASSIA_AT&T-069940–069942; ASSIA_AT&T-069947; ASSIA_AT&T-069951; ASSIA_AT&T-069961–069962; <i>see also</i>

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<p>ASSIA_AT&T-069850– ASSIA_AT&T-069974.</p> <ul style="list-style-type: none"> • AT&T's Invalidity Contentions • The patents and/or publications cited on the face of the '631 Patent.
12.	34	“machine-readable medium”	<p>No construction necessary.</p> <p>In the alternative: tangible medium of a computer program product.</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> • '631 Patent at 2:35–37, 19:1–28. • ASSIA_AT&T-014718–ASSIA_AT&T-014739. • Prosecution history of all claims of the '631 Patent. <i>See, e.g.</i>, ASSIA_AT&T-070346; ASSIA_AT&T-070508; ASSIA_AT&T-070832; ASSIA_AT&T-070834; ASSIA_AT&T-070837; <i>see also</i> ASSIA_AT&T-070340–ASSIA_AT&T-070850. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<p>Ioannis Kanellakopoulos.</p> <ul style="list-style-type: none"> • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050. • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069921–069924; ASSIA_AT&T-069881; ASSIA_AT&T-069936; ASSIA_AT&T-069958; ASSIA_AT&T-069959; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity

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				<p>Contentions</p> <ul style="list-style-type: none"> The patents and/or publications cited on the face of the '631 Patent.
13.	37	<p>“means for scheduling upstream time slots for upstream transmission in a first physical channel”</p>	<p>Not indefinite.</p> <p>Under 35 U.S.C. § 112(6), the function for this term is:</p> <p>“scheduling upstream time slots for upstream transmission in a first physical channel”</p> <p>The corresponding structure for this term includes: a TDD management system, a scheduling module, and/or equivalents thereof as described in the Summary, Fig. 12, 3:22–26; 5:36–56; 5:61–62; 6:6–8; 8:10–13; 9:41–10:42; 11:11–15; 13:7–33; 13:42–47; 13:62–66; 14:24–34; 14:47–15:3; 16:13–19; and 16:45–18:23.</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> '631 Patent at 1:24–40, 2:30–44, 3:26–30, 3:53–64, 4:42–65, 6:34–43, 7:52–63, 8:55–9:63, 10:14–42, 12:34–43, 13:34–14:10, 14:18–46, 15:28–33, 16:1–5, 16:40–53, 17:48–57, 18:12–23, Fig. 1, Fig. 4, Fig. 5, Fig. 8, Fig. 9, Fig. 11, Fig. 12, 3:22–26, 5:36–56, 5:61–62, 6:6–8, 8:10–13, 9:41–10:42, 11:11–15, 13:7–33, 13:42–47, 13:62–66, 14:24–34, 14:47–15:3, 16:13–19, 16:45–18:23, 1:24–34, 2:1–12, 2:30–44, Fig. 3, Fig. 4, Fig. 5, Fig. 6, Fig. 7. ASSIA_AT&T-014718–ASSIA_AT&T-014739. Prosecution history of all claims of the '631 Patent. <i>See, e.g.</i>, ASSIA_AT&T-070340–ASSIA_AT&T-070850.

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> • Expert declaration. • DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001–000252; ASSIA_AT&T-000275–001132; ASSIA_AT&T-00114–001290; ASSIA_AT&T-001294–001789; ASSIA_AT&T-001812–001969; ASSIA_AT&T-001999–002730; ASSIA_AT&T-002779–002934; ASSIA_AT&T-003256–003833; ASSIA_AT&T-004446–004505; ASSIA_AT&T-004531–004750; ASSIA_AT&T-010865–011050. • Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069921–069924.; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974. • AT&T's Invalidity Contentions

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<ul style="list-style-type: none"> The patents and/or publications cited on the face of the '631 Patent.
14.	37	<p>“means for scheduling downstream time slots for downstream transmission in a second physical channel subject to crosstalk from the upstream time slots, wherein transmission in the upstream time slots is substantially not simultaneous with transmission in the downstream time slots”</p>	<p>Not indefinite.</p> <p>Under 35 U.S.C. § 112(6), the term under construction should be “means for scheduling downstream time slots for downstream transmission in a second physical channel subject to crosstalk from the upstream time slots.”</p> <p>The function for this term is:</p> <p>“scheduling upstream time slots for upstream transmission in a first physical channel subject to crosstalk from the upstream time slots”</p> <p>The corresponding structure for this term includes:</p> <p>A TDD management system, a scheduling module, and/or equivalents thereof as described in the Summary, Fig. 12, 3:22-26; 5:36-56; 5:61-62; 6:6-8; 8:10-13; 9:41-10:42; 11:11-15; 13:7-33; 13:42-47; 13:62-66; 14:24-34; 14:47-15:3; 16:13-19; and 16:45-18:23.</p>	<p>Intrinsic Evidence:</p> <ul style="list-style-type: none"> '631 Patent at 1:24–40, 2:30–44, 3:26–30, 3:53–64, 4:42–65, 6:34–43, 7:52–63, 8:55–9:63, 10:14–42, 12:34–43, 13:34–14:10, 14:18–46, 15:28–33, 16:1–5, 16:40–53, 17:48–57, 18:12–23, Fig. 1, Fig. 4, Fig. 5, Fig. 8, Fig. 9, Fig. 11, Fig. 12, 3:22–26, 5:36–56, 5:61–62, 6:6–8, 8:10–13, 9:41–10:42, 11:11–15, 13:7–33, 13:42–47, 13:62–66, 14:24–34, 14:47–15:3, 16:13–19, 16:45–18:23, 1:24–34, 2:1–12, 2:30–44, Fig. 3, Fig. 4, Fig. 5, Fig. 6, Fig. 7, 1:18–20, 2:8–11, 2:25–44, Fig. 10, 5:17–25, 5:29–35, 5:61–6:2, 9:6–10, 9:21–24, 11:1–4, 11:33–39, 11:65–12:43, 13:1–6, 13:24–41, 14:24–34, 16:25–32, 17:29–38, 17:64–18:16. ASSIA_AT&T-014718–ASSIA_AT&T-014739.

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No.	Claims	Claim Term	ASSIA's Proposed Construction	Intrinsic and Extrinsic Evidence
				<ul style="list-style-type: none"> Prosecution history of all claims of the '631 Patent. <i>See, e.g.</i>, ASSIA_AT&T-070340-ASSIA_AT&T-070850. <p>Extrinsic Evidence:</p> <ul style="list-style-type: none"> Declaration and/or testimony of any of the disclosed expert(s) in this case, including Art Brody and/or Ioannis Kanellakopoulos. DSL Standards. <i>See, e.g.</i>, ASSIA_AT&T-000001-000252; ASSIA_AT&T-000275-001132; ASSIA_AT&T-00114-001290; ASSIA_AT&T-001294-001789; ASSIA_AT&T-001812-001969; ASSIA_AT&T-001999-002730; ASSIA_AT&T-002779-002934; ASSIA_AT&T-003256-003833; ASSIA_AT&T-004446-004505; ASSIA_AT&T-004531-004750; ASSIA_AT&T-010865-011050.

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				<ul style="list-style-type: none">• Dictionaries/technical references. <i>See, e.g.</i>, ASSIA_AT&T-069921–069924; <i>see also</i> ASSIA_AT&T-069850–ASSIA_AT&T-069974.• AT&T's Invalidity Contentions• The patents and/or publications cited on the face of the '631 Patent.